



DEPARTMENT OF THE NAVY  
BASE REALIGNMENT AND CLOSURE  
PROGRAM MANAGEMENT OFFICE, NORTHEAST  
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5090  
BPMO NE/LM  
Ser 07-124  
September 7, 2007

Ms. Christine A.P. Williams  
Remedial Project Manager  
Federal Facilities Superfund Section  
United States Environmental Protection Agency (EPA)  
1 Congress Street, Suite 1100 (HBT)  
Boston, MA 02114-2023

Ms. Claudia Sait  
Remedial Project Manager  
Maine Department of Environmental Protection (MEDEP)  
Bureau of Remediation and Waste Management  
State House, Station 17  
Augusta, ME 04333-0017

Dear Ms. Williams and Ms. Sait:

SUBJECT: RESPONSE TO COMMENTS FOR MONITORING EVENT 24 DRAFT  
REPORT, SITE 17, NAVAL AIR STATION BRUNSWICK, MAINE

Attached please find the response to comments for Site 17 Monitoring Event 24 Draft Report, Naval Air Station Brunswick, Maine. These responses are provided for your review and comment/concurrence.

If you have any questions, or comments, please contact the Navy's Remedial Project Manager, Lonnie Monaco at (215) 897-4911, or me at (215) 897-4915.

Sincerely,

A handwritten signature in cursive script that reads "Dawn C. Kincaid".

Dawn C. Kincaid, P.E.  
BRAC Environmental Coordinator  
By direction of BRAC PMO

Attachment:

Navy's response to comments for Site 17 Monitoring Event 24 Draft Report, NASB,  
Maine

Copy to:

EPA (M. Daley)

MEDEP (C. Evans)

Gannet-Fleming (P. Golonka, D. McTigue)

NASB (L. Joy, D. Mosher)

Lepage Environmental (C. Lepage)

NAVFAC Mid-LANT (L. Monaco, D. Barclift)

NAVFAC Atlantic (D. Waddill, J. Wright, B. Capito – Admin Record)

ECC (A. Easterday, G. Calderone, C. Guido)

Copy to: (w/o attach)

BLRA (C. Warren)

RAB Community Co-Chair (T. Fusco)

RAB Navy Co-Chair (CAPT Womack)

BASCE (E. Benedikt)

RAB Harpswell Representative (D. Chipman)

BRAC PMO (distribution)

**Responses to Comments Provided by the State of Maine,  
Department of Environmental Protection on the  
Site 17 Monitoring Event 24 (September 2006) Draft Report, July 2007  
Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Claudia Sait, MEDEP Project Manager  
Date: August 27, 2007  
Respondent: Navy  
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	The data overall are consistent with the past few years of monitoring, with low 4,4'-DDD and 4,4'-DDT detected at MW-NASB-67 in Monitoring Event (ME) 24 and with low 4,4'-DDD detected in MW-NASB-067 and low 4,4'-DDT detections in MW-NASB-097 reported in ME 25. None of these detections exceeded 0.1 ug/L. There are no indications of sampling or analytical issues that compromised the data. A summary of the site history through 2003 is included as an appendix, and is a useful addition. Improvements from past ME reports have been continued in the latest submittals.	<b>Noted.</b>
3	Table 1-2 and Table 3-1	The additional graphics and table entries are useful supporting information in the report, however the graphics for Table 3-1 need to have the x-axis dates converted to mm/dd/yy or some similar format.	<b>Concur.</b> The x-axis will have the dates converted to mm/dd/yy format.
4	Section 2.3	The text is missing the MEG for 4,4'-DDT of 1.0 µg/L. Please revise.	<b>Concur.</b> The text will include the MEG for 4,4'-DDT of 1.0 ug/l.
5	Section 3.1	The text in the first paragraph must be revised to reflect the 4,4'-DDD and 4,4'-DDT detections at MW-NASB-067 in the Fall 2006 round. MEDEP suggests the language in the second paragraph be revised as it is in the ME 25 report (Section 3.1, Bullet 1, third paragraph), which is a better description of the results and includes the low detections in ME 24.	<b>Concur.</b> The first paragraph will be revised to reflect the 4,4'-DDD and 4,4'-DDT detections at MW-NASB-067 in ME24.
6	Section 1.3 and Table 3-1	MEDEP notes that toxaphene, although not a site contaminant of concern, appears to have been eliminated from analyte list. Please provide the rationale for eliminating this analyte in the report or provide the data.	<b>Noted.</b> As provided for in the accepted Monitoring Event 22 response to Comment #2 (" <i>...Toxaphene will be removed from the laboratory reporting list, as it is not a historical LTMP COC</i> ") the Navy removed toxaphene from the analyte list. Toxaphene is not required in the Basewide QAPP (ECC/EA 2006) nor was it required in any of the past Site 17 LTMP analyte lists.

Comment #	Location	Comment	Response
7	Section 3.2	MEDEP cannot agree to entirely discontinuing the monitoring of groundwater at the site as long as buried waste remains at the site. However, MEDEP is open to discussing a reduction in monitoring, perhaps to sampling every other year. When the Remedial Investigation is completed then the required groundwater monitoring will be revisited, and further revisions to the LTMP are likely.	<b>Noted.</b> The future of Site 17 monitoring could be discussed during the September 2007 technical meeting.
8	Figures 1-2 and 1-3 and Table 1-1 and Table 1-2	Table 1-1 indicates that MW-NASB-209R and MW-NASB-210 are part of the long term monitoring as gauging locations, however they were not gauged in either ME2 4 or ME 25 or the data was not included in the reports. Figure 1-2 must be expanded to show the wells in both reports and future rounds must include the gauging of these wells. That data must be then be included in the appropriate tables and shown on Figure 1-2 and Figure 1-3 or their equivalent.	<b>Noted.</b> These wells were not gauged. As per the November 2004 LTMP for Site 17, MW-NASB-209R and MW-NASB-210 are not part of the Long-Term Monitoring Program. To reflect this, they will be removed from Table 1-1. However, historically these wells were gauged to provide additional data on local groundwater flow patterns. They will be gauged during the Fall 2007 sampling event. Their locations and data will be represented and reported in the Fall 2007 monitoring event report with the following footnote: "These wells are not part of the Site 17 Long-Term Monitoring Program but are gauged to provide additional data on local groundwater flow patterns."
END OF COMMENTS			

**Responses to Comments Provided by the United States Environmental Protection Agency**  
**New England – Region 1 on the**  
**Sites 17 Monitoring Event 24 (September 2006) Draft Report, July 2007**  
**Naval Air Station, Brunswick, Maine**

Reviewer: Ms. Christine Williams, EPA Project Manager  
Date: August 16, 2007  
Respondent: Navy  
Date: September 7, 2007

Comment #	Location	Comment	Response
1	General	Water-level gauging was conducted at six wells, as per the monitoring plan. The inferred equipotential surface (Fig. 1-3) indicates flow from NW to SE. Results are consistent with historical records. Groundwater sampling was carried out at three wells, as per the plan. Most pesticides were non-detect (ND), demonstrating that contamination is no longer detectable at these wells. 4,4'-DDD (0.071J ppb) and 4,4'-DDT (0.016J ppb) were detected at low concentrations at MW-NASB-067. (For comparison, the Maine MEG for 4,4'-DDT is 1 ppb.) Historical detections were found principally at MW-NASB-097; heptachlor epoxide and alpha chlordane were previously above their respective Maine MEGs	<b>Noted.</b>
2	General	It is agreed that the LTMP should be reviewed following planned additional characterization and soil removal (e.g., p. 3-2, sec. 3.2). However, monitoring coverage and frequency should not be reduced until any soil removal is completed, and several rounds under the current plan are completed, in order to verify that the removal has not (at least temporarily) mobilized groundwater contamination due to disturbed ground, open excavations, etc.	<b>Noted.</b> As mentioned in MEDEP comment #7, the future monitoring could be discussed at the next technical meeting.
3	Page 1-1, Section 1.3	Please note that the text refers the reader to Table 1-3 for the low-flow field parameters, while the table is labeled Table 3-1. Please edit for consistency	<b>Concur.</b> The text will be edited to read Table 3-1.
4	Page 1-1, Section 1.3	The historical trend plots for field parameters (Table 3-1) are welcome. This allows for a quick, visual assessment of whether or not any particular parameter from any particular round falls within its historical range, or is anomalous. It is noted in this regard that the ORP data (not shown graphically) from ME24 show significant departures from the historical averages. At MW-NASB-067, ORP was recorded at +335 mV, compared to a historical average of 77 mV. At MW-NASB-098, ORP was recorded at -9 mV, compared to a historical average of +87 mV. How do these apparent anomalies compare to their respective historical ranges?	<b>Noted.</b> The ORP data will be provided graphically so that comparisons can be made.

Comment #	Location	Comment	Response
5	Page 2-1, Section 2.2	The text refers the reader to Table 1-3 for the low-flow field parameters, while the table is labeled Table 3-1. Please edit for consistency.	<b>Concur.</b> The text will be edited to read Table 3-1.
6	Page 2-1, Section 2.3	The text states, "Pesticides results for all sampled Site 17 monitoring wells from Monitoring Event 21 (April 2005) through Monitoring Event 24 (September 2006) were non-detect. However, Table 1-4 indicates that 4,4'-DDD (0.071J ppb) and 4,4'-DDT (0.016J ppb) were detected at MW-NASB-067, albeit at low concentrations. Please edit for consistency.	<b>Concur.</b> The first paragraph will be revised to reflect the 4,4'-DDD and 4,4'-DDT detections at MW-NASB-067 in ME24.
7	Page 2-2, Section 2.3	The text refers to the MEG for 4,4'-DDT at "0.XX" micrograms per liter. It appears from Table 1-4 that the value is intended to be 1 microgram per liter. Please edit.	<b>Concur.</b> The text will include the MEG for 4,4'-DDT of 1.0 ug/l.
8	Page 3-1, Section 3.1	The text states, "No issues concerning integrity of the monitoring wells were identified." While it appears that the wells were in sufficiently good condition to yield good water-quality samples, sec. 1.5 (p. 1-2) notes that MW-NASB-097 had no label, no lock, and a broken road box. This might be repeated again here for completeness.	<b>Noted.</b>
9	Page 3-2, Section 3.2	Please see General Comment regarding discontinuation of groundwater monitoring at the site.	<b>Noted.</b>
<b>END OF COMMENTS</b>			